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Janssen Biotech, Inc. et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No.. 1:15-cv-10698-MLW
)	
Celltrion Healthcare Co., Ltd. et al.,)	
)	
Defendants.)	
)	
)	

Defendants Celltrion Healthcare Co., Ltd., Celltrion, Inc. and Hospira Inc. (collectively “Defendants”) hereby move this Court for (1) an extension of time to file their Reply, pursuant to Local Rule 56.1, in support of their Cross-Motion for Partial Summary Judgment [*Dkt 50*], presently required to be filed by June 3, 2015, to and including June 15, 2015, and (2) leave to file a Sur-Reply Memorandum in further opposition to Plaintiffs’ Motion for Injunction [*Dkt 34*].

¹ On May 19, 2015, Plaintiffs filed an Assented To Motion For Leave To File A Reply Brief, An Overlength Brief, And Papers Under Seal [*Dkt* 59]. Then, on May 20, 2015, without a ruling from the Court, Plaintiffs filed a twenty-five page memorandum addressing both Defendants' Cross-Motion for Partial Summary Judgment and Plaintiffs' Motion for Injunction [*Dkt* 60]. As such, Plaintiffs' May 20, 2015 filing was functionally an Opposition and Reply in one document.

PhD., Plaintiffs' expert [*Dkt* 62]. Defendants' full response to Plaintiffs' combined memorandum requires the input of Defendants' expert, who has recently switched firms, thus causing logistical delays; this is the main reason for the additional time requested for Defendants' combined Reply and Sur-Reply brief.

Plaintiffs have stated that they assent to additional time for Defendants' Reply brief but do not assent to Defendants' filing of a Sur-Reply. Specifically, Plaintiffs oppose any sur-reply or additional expert evidence.

WHEREFORE, Defendants Celltrion Healthcare Co., Ltd., Celltrion, Inc. and Hospira Inc. respectfully request that the Court grant (1) an extension of time to file their Reply, from June 3 to June 15, and (2) leave to file a Sur-Reply Memorandum.

Dated: June 2, 2015

Respectfully submitted,

Celltrion Healthcare Co., Ltd., Celltrion, Inc.
and Hospira Inc.

By their attorneys,

/s/Andrea L. Martin

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LR 7.1(a)(2) CERTIFICATION

I, Andrea L. Martin, hereby certify that Defendants' counsel has conferred with Plaintiffs' counsel concerning the relief requested in this motion. Plaintiffs partially assent to and partially oppose this Motion as set forth herein.

/s/Andrea L. Martin, Esq.
Andrea L. Martin, Esq.

CERTIFICATE OF SERVICE

I, Andrea L. Martin, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 2, 2015.

/s/Andrea L. Martin, Esq.
Andrea L. Martin, Esq.